

DAVID Z. CHESNOFF, ESQ.
Nevada Bar No. 2292
RICHARD A. SCHONFELD, ESQ.
Nevada Bar No. 6815
CHESNOFF & SCHONFELD
520 South Fourth Street
Las Vegas, Nevada 89101
Telephone: (702) 384-5563
Attorneys for Defendant, *BESART HOXHA*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * * * *

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Case No. 2:17-cr-306-JCM-VCF
)	
v.)	
)	
BESART HOXHA, et al.)	
)	
Defendant.)	
_____)	

**STIPULATION AND ORDER FOR A PRE-PLEA REPORT FOR
DEFENDANT BESART HOXHA**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through DAVID L. JAFFE, ESQ., Chief, United States Department of Justice Organized Crime and Gang Section, KELLY PEARSON, ESQ., and CHAD W. MCHENRY, ESQ., Trial Attorneys; and the Defendant, BESART HOXHA (“Mr. Hoxha”), by and through his attorneys, DAVID Z. CHESNOFF, ESQ., and RICHARD A. SCHONFELD, ESQ., of the law firm of CHESNOFF & SCHONFELD, as follows:

1. On January 30, 2018, a grand jury in the District of Nevada returned the Second Superseding Indictment (“the Indictment”) against Mr. Hoxha, among others. ECF No. 303. The Indictment charged Mr. Hoxha with, *inter alia*, Racketeering Conspiracy, in violation of 18 U.S.C.

1 § 1962(d), alleging that the Defendants conspired to participate in the conduct of the affairs of the
2 Infraud Organization through a pattern of racketeering activity;

3
4 2. On September 9, 2022, Mr. Hoxha was extradited from Kosovo and arrived in the
5 District of Nevada. On September 12, 2022, Mr. Hoxha had his initial appearance before the Court.
6 The jury trial in this matter is currently set for August 7, 2023, at 9:00 a.m. ECF 1104;

7
8 3. On September 12, 2022, the Court designated the above-captioned case as complex
9 and ordered the parties to submit a complex case management order;

10 4. On November 15, 2022, Mr. Hoxha retained new counsel, Mr. David Chesnoff and
11 Mr. Richard Schonfeld;

12
13 5. The parties hereby stipulate to an Order directing the United States of Parole &
14 Probation to conduct a full pre-plea presentence investigation and prepare a report for Mr. Hoxha,
15 which includes, but is not limited to, potential Offense Level Calculations and the Criminal History
16 Score;

17
18 6. The pre-plea presentence report will promote judicial economy and could enable this
19 case being resolved. Moreover, Counsel requires a pre-plea presentence report to assist in providing
20 Mr. Hoxha with effective assistance of counsel;

21 7. Furthermore, Mr. Hoxha consents to the pre-plea presentence investigation;

22 8. Mr. Hoxha is in custody, and he does not oppose this request;

23
24 9. Defense Counsel for Mr. Hoxha has spoken to counsel for the Government, and the
25 Government has have no objection to this request;

1 10. Therefore, undersigned counsel respectfully requests that this Honorable Court issue an
2 Order directing the United States of Parole & Probation to conduct a pre-plea presentence
3 investigation and prepare a report for Mr. Hoxha. United States of Parole & Probation has indicated
4 that it will take approximately 60 days to prepare the report; and
5

6 11. By entering into this stipulation, Mr. Hoxha is not making any admissions of guilt
7 and the Court will not make any adverse findings against Mr. Hoxha.
8

9 **DATED** this 19 day of July, 2023.

10 Respectfully submitted,
11

12 UNITED STATES OF AMERICA

13 DAVID L. JAFFE, ESQ.
14 Organized Crime and Gang Section

15 _____
16 /s/ Kelly Pearson
17 KELLY PEARSON, ESQ.
18 CHAD W. MCHENRY, ESQ.
19 Trial Attorneys

20 CHESNOFF & SCHONFELD

21 _____
22 /s/ Richard A. Schonfeld
23 DAVID Z. CHESNOFF, ESQ.
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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

* * * * *

UNITED STATES OF AMERICA

Plaintiff,

v.

BESART HOXHA, et al.

Defendant.

Case No. 2:17-cr-306-JCM-VCF

ORDER

Having considered the Stipulation of the Parties, and good cause being shown, the Court hereby finds and Orders as follows:

IT IS HEREBY ORDERED that the United States Department of Parole and Probation shall conduct a full pre-plea presentence investigation and prepare a report for Defendant Besart Hoxha, which includes, but is not limited to, potential Offense Level Calculations and the Criminal History Score. United States of Parole & Probation shall have 60 days from entry of this order to prepare the report.

